

Butte Resource Management Plan/ Environmental Impact Statement Scoping Report

**U.S. Department of the Interior,
Bureau of Land Management
Butte Field Office
Butte, Montana**



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- Appendix A: Federal Register Publication: Notice of Intent
- Appendix B: Notes from Meetings with County Commissioners, the Big Hole Watershed Committee, the Resource Advisory Council, and American Wildlands
- Appendix C: Legal Notices and Press Releases
- Appendix D: Scoping Meeting Handouts, Sample Sign-In Sheet, and BLM Butte Field Office PowerPoint Presentation
- Appendix E: Agency Letter Received During Scoping Period
- Appendix F: Written Comments Summary

Copies of all comments received during the scoping period are available for review at the Butte Field Office.



Executive Summary

This report documents the public scoping process for the Bureau of Land Management's (BLM) Butte Field Office (FO) Resource Management Plan (RMP) and Environmental Impact Statement (EIS). The Scoping Report includes an introduction; an overview of the planning schedule; a description of the scoping process; a description of the six scoping meetings; a summary of verbal comments and written comments submitted by the public; and an overview of the issues identified through all scoping comments.

The purpose of "scoping" is to identify issues important to the future management of public lands and resources. These issues will guide development of alternatives that will be evaluated in the EIS and will ultimately guide development of the RMP. The scoping process also provides an opportunity to educate the general public about the management of public lands and for BLM to gauge the concerns of those who have a stake in the resources of the area.

Public Scoping and Issue Identification

Upon publication in the Federal Register of the Notice of Intent (NOI) to prepare an RMP, the BLM Butte FO initiated the first phase of the public scoping process, including a call for resource information and the identification of issues for this planning effort. The official 60-day scoping period began December 19, 2003 with the publication of the Notice of Intent (NOI), documenting BLM's intent to prepare an RMP. The formal scoping period lasted until February 17, 2004.

Throughout the scoping process, the BLM approach has been one of open communication and dialogue. The agency solicited input above and beyond minimum regulatory requirements. A total of six scoping meetings were held. Comments were accepted through a variety of methods (email, website, mail, fax) to ensure that those who wished to comment could do so.

Public Scoping Meetings

During the six scoping meetings, 37 people registered their attendance. The meetings started with a formal presentation by the Butte FO District Manager. After the presentation, the meetings were structured in an open house format, with four resource stations: (1) Fire/Fuels, (2) Range, Wildlife/Fish, Forestry, Weeds, (3) Realty, Recreation/Access, Mining, Cultural/Historic, and (4) Planning, ACECs, and Special Designations. BLM specialists staffed these resource stations and were available to answer any questions. This open house format allowed BLM staff to mingle with the public in a casual environment.



Public Scoping Comments

Comment forms were available at the six scoping meetings to collect comments. No written comments were offered during public meetings; however, verbal comments were received and recorded. In addition, approximately 554 written comments were received through the various methods. For organization and analysis purposes, comments were categorized into the following 18 topic areas:

- Air Quality
- Cultural Resources
- Lands and Realty
- Minerals/Mining
- Recreation Resources, including Public Access
- Off-Highway Vehicle (OHV) Use
- Transportation and Access
- Socioeconomics
- Soils
- Surface Disturbance Restriction Decisions, including Erosion Control
- Vegetation, including Weed Control
- Fire Management
- Forestry Management
- Livestock Grazing
- Water Quality and Watershed
- Wildlife and Fisheries
- Special Management Areas
- General Comments

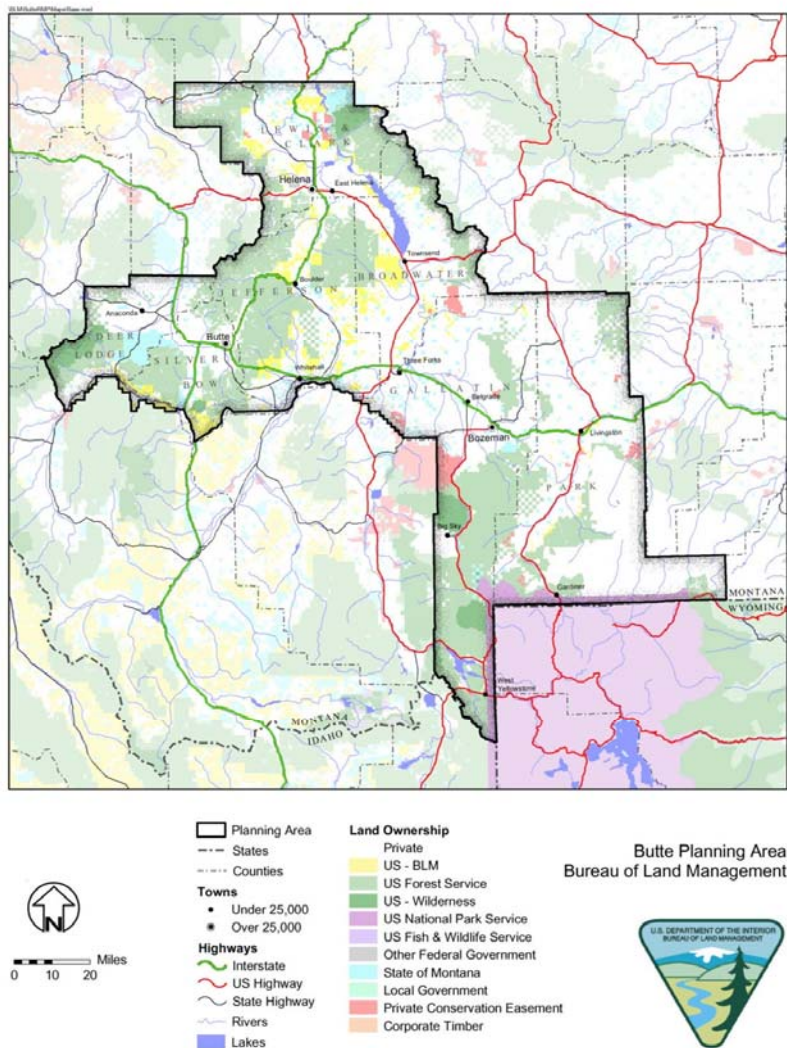
This scoping report summarizes both verbal and written comments that were received during the Butte RMP scoping process.



Introduction

The Bureau of Land Management (BLM) Butte Field Office (FO) is starting a process to revise its existing Resource Management Plan (RMP) for approximately 311,000 acres of public land surface and 656,000 acres of federal mineral estate land in eight counties in midwestern Montana. The RMP will address management concerns for surface and mineral estate land administered by the BLM and will provide a comprehensive framework for managing and allocating public land and resources within the Butte FO boundary. A supporting environmental impact statement (EIS) will be prepared. The EIS will address a wide variety of issues and analyze a reasonable range of alternatives for resource management in the planning area. Figure 1 shows the Butte FO boundary.

Figure 1. Butte RMP Planning Area.



Lands administered by the Butte FO are currently being managed under the 1984 Headwaters RMP. The Butte FO needs an updated RMP to incorporate changes that have occurred in the last 20 years. A jurisdictional transfer of land in 1983 resulted in a boundary adjustment for the RMP planning area and, in 1997, the Butte BLM District office was designated a field office. The Butte RMP revision will, pursuant with the Federal Land Policy and Management Act (FLPMA), result in a document that will (1) update existing management decisions for lands in the Butte FO, (2) address new data, (3) address changes in resource conditions and a new Butte FO boundary, and (4) integrate and modify uses of public land that have occurred since the Headwaters RMP and other plans were completed.

Informational Documents, Planning Criteria, and Issues

The Butte FO prepared and distributed a newsletter titled “Planning for the Future: Resource Management Plan for Public Land Administered by the BLM Butte Field Office in the Mid-Western Portion of Montana.” This newsletter was sent to individuals on the mailing list and was provided at public meetings. A copy is on the Butte FO website and is also contained in Appendix D.

Using applicable laws, regulations, and guidance, the Butte FO developed proposed planning criteria consisting of constraints or ground rules that will direct the preparation of the RMP. This criterion will be used throughout the RMP/EIS and may be adjusted, based on public comment. In addition, the Butte FO identified preliminary planning issue areas of concern and resources having specific management concerns. Additional issues and management concerns will likely be added throughout the process, based on public input. A copy of the proposed planning criteria and planning issues and management concerns is contained in Appendix D. The Butte FO also developed a Preparation Plan for the Butte RMP/EIS. The purpose of this Preparation Plan is to:

1. Identify anticipated planning issues and management concerns;
2. Identify preliminary planning criteria and outstanding questions that must be addressed to support management decisions;
3. Identify a standard document format (e.g., documents, maps, tables, photos, etc.) for the presentation of the process, information, and decisions, including presentation on the Internet;
4. Identify information or data needed to resolve or address identified issues, management concerns, planning criteria, and outstanding questions;
5. Identify available data and data collection/format standards, and provide an explanation of how the data support the plan itself, and how the data address the planning requirements and anticipated issues or outstanding questions;
6. Identify any known or anticipated data gaps and provide an explanation of why the data are needed to support the plan itself, how the data support the planning requirements and how the data address anticipated issues or outstanding questions;



7. Establish a data inventory and collection activity plan, that is coordinated with other agencies, which include data standards, work-month costs, staffing and skill requirements, and estimated time-frames needed to establish an integrated, automated geospatial database for filling in data gaps;
8. Establish a communication process for direct communication with the public and to ensure greater public involvement in the planning process and to ensure wide distribution of relevant information;
9. Establish a work plan that identifies the staffing and technology needs to support public involvement and communication through the use of the Internet; and
10. Identify the analytical process required to answer or address outstanding questions, issues, or concerns.

A complete copy of the Preparation Plan is located on the Butte RMP/EIS website at <http://www.mt.blm.gov/bdo/>. The Butte FO is currently working on data management and the Analysis of the Management Situation (AMS) will address data gaps in greater detail.

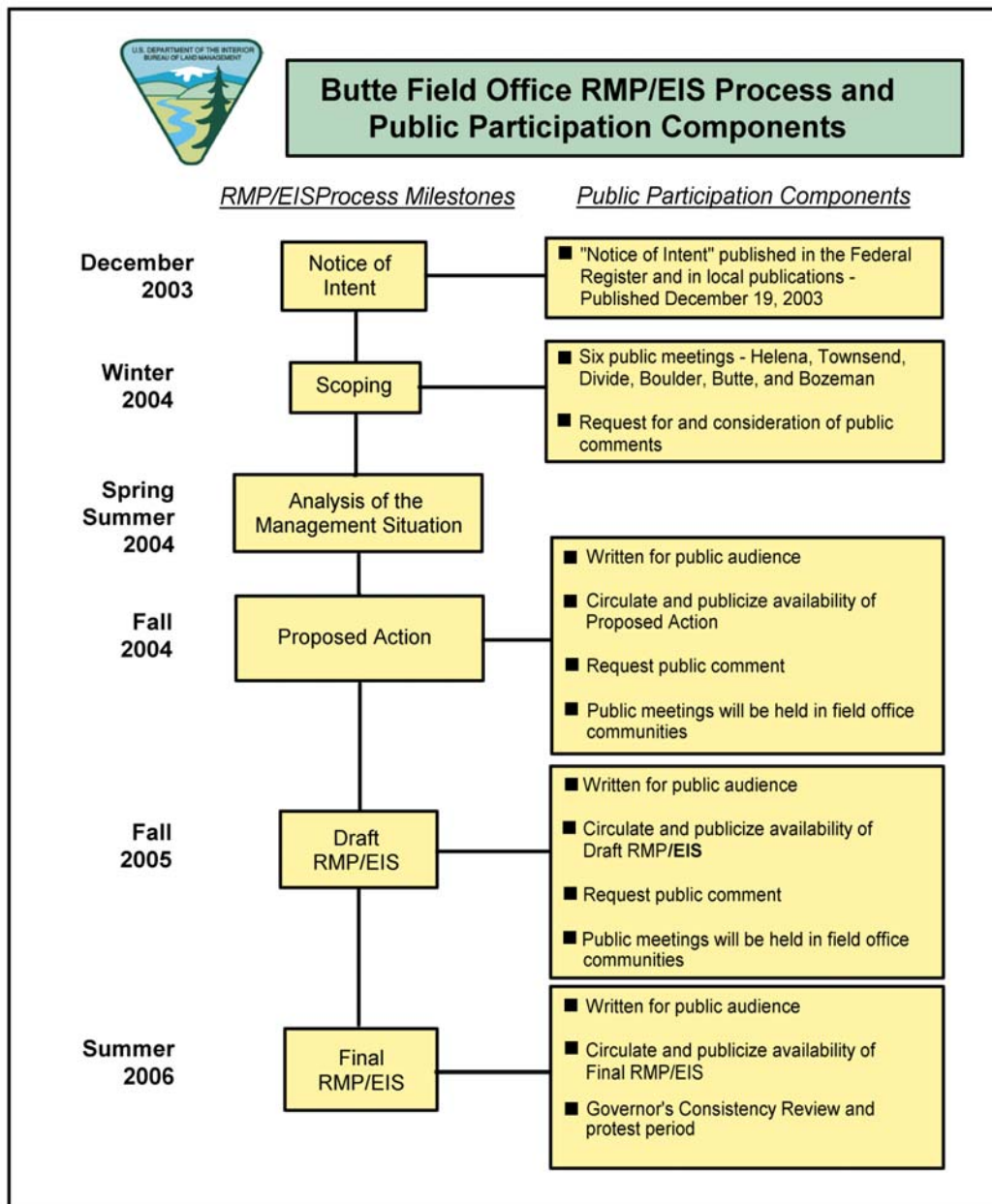
In compliance with the National Environmental Policy Act (NEPA), the BLM initiated a scoping process to determine issues related to the development of the Butte FO RMP and the associated EIS. This report describes the scoping process, the methods of comment retrieval, and a summary of issues brought forward during scoping categorized by resource area.



Butte Field Office RMP/EIS Planning Schedule

As illustrated in Figure 2, the process for the Butte RMP revision and accompanying EIS began with the publication of the Notice of Intent (NOI) in the *Federal Register* on December 19, 2003. The process continues through scoping, alternatives development, and the development of a Draft EIS and Final EIS. The public will have the opportunity to comment throughout the scoping process. Some methods for ongoing public involvement are identified in the newsletter titled "Planning for the Future: Resource Management Plan for Public Land Administered by the BLM Butte Field Office in the Mid-Western Portion of Montana," which is contained in Appendix D.

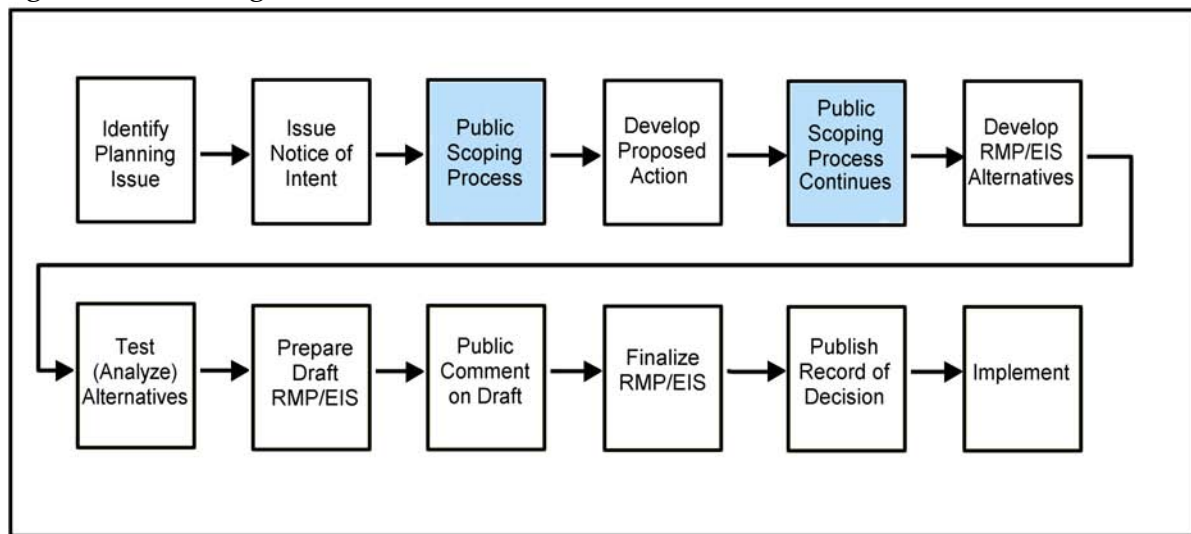
Figure 2. Butte Field Office RMP/EIS Planning Schedule



Scoping Process

Scoping is the process required by NEPA in the early stages of developing an EIS to determine the scope and significance of issues related to a proposed action, in this case, the writing and implementation of a new RMP (40 CFR 1501.7). Knowing the scope and the significance of issues allows for an accurate and timely environmental analysis. In addition to this, scoping helps identify issues important to the management of the area, as well as issues to be examined in the planning process. The scoping process is designed to encourage public participation and to solicit public input. Although only one of the many steps in the planning process, scoping is an essential step to ensure that all issues are brought to the table.

Figure 3. Planning Process



Rationale will be provided in the plan for each issue included. Alternatives will then be developed and analyzed incorporating the issues identified during the scoping process and the Draft EIS will be published and made available for public review.

In accordance with the planning schedule (Figure 2), the scoping process formally began with the publication of the NOI (Appendix A), documenting BLM's intent to prepare an RMP. In addition, interested individuals and organizations, affected Federal, State, and local agencies, as well as affected Indian Tribes were invited to submit comments to the BLM. The BLM FO also met with several groups, including County Commissioners (Lewis and Clark, Silver Bow, Broadwater, Deer Lodge, and Jefferson counties); the Big Hole Watershed Committee, the Resource Advisory Council (RAC); American Wildlands; and the East Pioneers Stewardship Group. Notes for these meetings are included in Appendix B. The BLM invited the State of Montana, four Native American Tribes, and eight counties to be cooperating agencies in the RMP revision; no responses were received for formal cooperating agency status, however,



regular briefings and other forms of collaboration will occur for those governments wishing to stay involved throughout the process.

The official 60-day scoping period began December 19, 2003 with the publication of the NOI. Although the scoping period ended February 17, 2003, the BLM will consider issues brought forward any time during the planning process. Only comments submitted during the initial scoping period, however, are summarized in this report. Comments heard regarding the draft RMP (proposed action) will be added to this report.

Butte RMP Website

An important vehicle used during the scoping process to solicit comments and educate the public is the Butte RMP Website. Located at <http://www.mt.blm.gov/bdo/>, the website houses the latest information on the development of the RMP/EIS, including background documents, maps, meeting announcements, published bulletins, and other documents. An interactive feature entitled “Public Participation” enables the user to be added to the Butte RMP mailing list

Figure 4. Butte RMP Website Homepage



The site is divided into 12 main sections:

- **Home:** Provides a general overview of the program, details of the RMP, and includes a site map
- **RMP Schedule:** Lists the preliminary project schedule
- **Digest:** Briefly describes the purpose of the RMP and provides links to additional information



- **Public Participation:** Provides information of time/date/location of all public meetings
- **Issue Overview:** Describes critical issues for the plan
- **Updates:** Contains the most current information developed by the RMP project team
- **News Releases:** Contains press releases, project newsletters, and the NOI
- **Planning Team Minutes:** Contains notes from meetings with the project interdisciplinary (ID) team.
- **Wild and Scenic Rivers:** States that special consideration must be given to wild and scenic rivers throughout the RMP.
- **Maps:** Contains a variety of maps, including the Butte FO base map
- **Photographs:** Contains photographs taken throughout the RMP planning area
- **Contacts:** Provides information of project leaders to contact for additional information



Public Scoping Meetings

Public scoping meetings provide an opportunity for interested parties to submit scoping comments and may be a part of the early and open scoping process NEPA requires (40 CFR 1501.7). These meetings are particularly important when there is “substantial environmental controversy concerning the proposed action or substantial interest in holding the [meeting]” (40 CFR 1506.6c1).

Meeting Logistics and Attendance

The Public Scoping Notice (Appendix C) announced six public scoping meetings. Public notice of the scoping meetings was published in the following newspapers:

- The Boulder *Monitor* – December 31, 2003
- The Dillon *Tribune* – December 31, 2003
- The Great Falls *Tribune* – December 23, 2003
- The Jefferson County *Courier* – December 31, 2003
- The Montana *Standard* – December 23, 2003

A press release was sent to the following newspapers, radio stations, and television stations via fax and e-mail:

Newspapers

Anaconda Leader (Anaconda)
Associated Press (Helena and Billings)
Billings Gazette (Billings)
Bitterroot Star (Stevensville)
Blackfoot Valley Dispatch (Lincoln)
Boulder Monitor (Boulder)
Bozeman Daily Chronicle (Bozeman)
Bozeman Daily Chronicle (Livingston)
Butte Weekly (Butte)
Dillon Tribune (Dillon)
Great Falls Tribune (Great Falls)
Helena Independent Record (Helena)
High Plains Guardian (Malmstrom AFB)
Idaho Post Register
Jefferson County Courier (Clancy)
Livingston Enterprise (Livingston)
Madisonian (Ennis)
Missoula Independent (Missoula)
Missoulain (Missoula)
Montana Standard (Butte)
Montana Standard (Dillon)



Philipsburg Mail
Queen City News (Helena)
RounTown Review
Seeley Swan Pathfinder
Silver State Post (Deerlodge)
Three Forks Herald
Townsend Star
Whitehall Ledger
Wolf Creek Newspaper

Radio Stations

KBLL (Helena)
KCAP/KZMT (Helena)
KGR (Helena)
KMTX (Helena)
KGVO/KLCY/KYSS (Missoula)
KMSO (Missoula)
KGGL/KZOO/KYLT/KGRZ/KDXT (Missoula)
KUFM (PBS - Missoula)
KQUY/KAAR/KMBR/KXTL (Butte)
KBOW/KOPR (Butte)
KANA/KGLM (Anaconda)
KDBM/KBEV (Dillon)
KQRV (Deer Lodge)
KPKX/KBOZ/KOBB/KZLO (Bozeman)
KMMS/KSKY/KXLB (Bozeman)
KPRK (Livingston)
KTVM Butte Montana Today
University of Montana

Television Stations

HCTV (Helena)
KCTZ TV (Bozeman)
KECI TV (Missoula)
KPAX TV (Missoula)
KTVH TV (Helena)
KTVM TV (Butte)
KXLF TV (Butte)
KTVQ TV (Billings)
KULR8 TV (Billings)
KRTV (Great Falls)
KFBB (Great Falls)
KTGF TV (Great Falls)



Six public meetings were held over a two-week period in January, 2004. Total registered attendance for all six meetings was 37. Table 1 illustrates the attendance at each scoping meeting.

Table 1. Meeting Location/ Attendance

MEETING LOCATION	MEETING DATE	ATTENDANCE
Helena, MT	January 6, 2004	7
Boulder, MT	January 8, 2004	2
Wise River/Divide, MT	January 13, 2004	6
Butte, MT	January 13, 2004	14
Bozeman, MT	January 14, 2004	4
Townsend, MT	January 15, 2003	4

Attendance at each public scoping meeting was recorded using a sign-in sheet at the registration station at each meeting. An example of this sign-in sheet can be found in Appendix D. Four resource-specific handouts were made available to the public. Copies of the handouts can also be found in Appendix D.

Comments were solicited in a manner that provided an opportunity for everyone attending the public meeting to provide input.



Verbal Scoping Comments

During the six scoping meetings, participants asked questions, expressed concerns, and made suggestions. Table 2 summarizes verbal comments that were expressed during the scoping meetings. The public was encouraged during the meetings to document all comments in writing using public comment forms to ensure that their comments were accurately recorded. Written comments are summarized in the following section.

Table 2. Summary of Verbal Scoping Concerns and Suggestions

Date/Location	Concerns and Suggestions
January 6, 2004 Helena, Montana	<p>Concerns:</p> <ul style="list-style-type: none"> ✓ Maintaining access to public land ✓ Weed management by goats in the Scratchgravel Hills ✓ Fuel management policies: should think out of the box, try a let-it-burn policy for some areas ✓ Means by which the public can weigh in on site-specific plans ✓ Planning process is not site-specific enough ✓ Land-ownership adjustments <p>Suggestions:</p> <ul style="list-style-type: none"> ✓ Put public comments on the website ✓ Update the website frequently
January 8, 2004 Boulder, Montana	<p>Concerns:</p> <ul style="list-style-type: none"> ✓ Grazing ✓ Fire/fuels management
January 13, 2004 Divide, Montana	<p>Concerns:</p> <ul style="list-style-type: none"> ✓ Sage grouse and lynx preservation efforts vs. grazing rights ✓ Ecosystem management practices might hamstring the grazer ✓ Impact of the Plan on fluvial grazing (how far south and north?) ✓ Will the RMP/EIS include non BLM land when evaluating cumulative impacts to grazing? ✓ Impact of the Threatened and Endangered Species Act on grazing rights ✓ Cost effectiveness of revising the 1984 Plan vs. amending it ✓ Questions about a national RMP and Dillon's RMP ✓ Incorporation of Dillon RMP area issues into the Butte area RMP. ✓ Catalyst for a new plan, is it because of a change in political administration? Will another plan be written if there is a new administration in Washington DC? ✓ Continuity of BLM planning procedures as they change from the old RMP to a new one. ✓ Tetra Tech's capability to assist the BLM with the RMP/EIS ✓ A public working group organization, scope and association with the RAC ✓ Danger of losing objective approach to the planning process if someone writing the RMP has a personal agenda or axe to grind



Date/Location	Concerns and Suggestions
	<ul style="list-style-type: none"> ✓ Selection process for the contracted consultants. What kind of company has people just waiting around for an RMP to be written? ✓ Fuels management policies, need to be more judicious with fire fighting efforts. Don't waste resources on nonproductive efforts. <p>Suggestions:</p> <ul style="list-style-type: none"> ✓ Holding meetings in Divide is much easier for locals to attend than in Butte ✓ Meeting times: evenings are better ✓ Meeting advertising: put a poster in the Post Office ✓ Use fewer acronyms
<p>January 13, 2004 Butte, Montana</p>	<p>Concerns:</p> <ul style="list-style-type: none"> ✓ Land-ownership adjustments ✓ Access to public lands ✓ Inappropriate land exchanges ✓ Valuation methodology for land exchanges (should consider recreation and wildlife habitat and more valuable than grazing and timber) ✓ No updated map available to view past land exchanges and ownership adjustments ✓ Consider the cumulative effects of loss of BLM public land in addition to lost state lands ✓ Interaction with other agencies when relevant issues are addressed in Plans (such as the USFS, Bureau of Reclamation, DNRC, etc) ✓ Federal expenditures to write the Butte RMP ✓ Openness of the contracting process ✓ Capability of the contractor to assist the BLM with this RMP ✓ Meaningfulness of the RMP (is it a paper exercise or will it make a difference?) ✓ Adequacy of an inventory of who the users really are of BLM land ✓ Legal requirements regarding found arrowheads ✓ Potential for land with a private cabin to be purchased (some BLM land is leased by WWII veterans) ✓ The origin of BLM land (for the most part, originally from the Louisiana Purchase, some from failed homesteads acquired through the Homestead Act) ✓ Public access to other public comments during scoping ✓ Access to public land for hunting and fishing has been curtailed ✓ Criteria for disposal of public land ✓ BLM's ability to reclaim access that has been lost to some public lands (specifically near the Big Hole River) ✓ How land exchanges are addressed in the existing RMP and how they will be addressed in the new RMP ✓ The accessibility of the RMP and EIS to the average citizen (not hard to read, not voluminous) <p>Suggestion:</p> <ul style="list-style-type: none"> ✓ Make the RMP readable and understandable and easy to access



Date/Location	Concerns and Suggestions
January 14, 2004 Bozeman, Montana	<p>Concerns:</p> <ul style="list-style-type: none"> ✓ Prefer use of fee title purchase to acquire lands rather than trading value for value because land values that are important to me are not taken into account when valuing the land for trade ✓ The criteria for valuing land for land exchange, disposal or acquisition should be different. ✓ Are there any BLM wilderness areas in your field area? ✓ Mining on BLM land is not appropriate <ul style="list-style-type: none"> • What is the abandoned mine program? • Do you try to find the responsible party before spending taxpayer money? • How much is BLM involved in the Golden Sunlight Mine (GSM)? • Did you ever dispose of land to GSM? • Concern about mineral estate and what areas should be open for mineral extraction. • What land is open for mining under the 1872 Mining Act? • How are claims “proved up”? • Is BLM considering patenting any new mining claims in there area (speaker is against any new patented claims or loss of public land in any way). • There should be a moratorium on patenting mining claims. • How will working groups be organized, by issue or geographic area, or will there be only one group? ✓ The fate of the Elkhorn area is important for wildlife habitat ✓ Would like to see the Muskrat Wilderness Study Area remain as a study area ✓ What are the main aquatic issues for the RMP so far? ✓ Does the checkerboard private land north of Whitehall belong to one owner or different owners? ✓ How many streams will be eligible for wild and scenic designation? ✓ What is the history of BLM land? ✓ How many grazing permits do you have? ✓ Grazing in riparian areas should be addressed in the RMP and should be better controlled. Does the BLM have recreational residences like the USFS does? ✓ What is the criteria for an ACEC?
January 15, 2004 Townsend, Montana	<ul style="list-style-type: none"> ✓ What is a “Special Designation”? ✓ I would like to buy 120 acres of land by the Toston Dam from the BLM, will there be any opportunities for a land exchange? ✓ Will the BLM coordinate with the local weed board regarding the RMP?

Representatives from the Butte FO also met with several groups, including County Commissioners (Lewis and Clark, Silver Bow, Broadwater, Deer Lodge, and Jefferson counties); the Big Hole Watershed Committee, the Resource Advisory Council (RAC); American Wildlands; and the East Pioneers Stewardship Group. Table 3 summarizes



comments that were made during these meetings. Notes for these meetings are included in Appendix B.

Table 3. Summary of Verbal Concerns Expressed by County Commission, the Big Hole Watershed Committee, the RAC, and American Wildlands

Date/Location	Comments
February 24, 2004 Lewis and Clark County Commissioners	✓ Add a statement to Proposed Planning Criteria #8 regarding "including infrastructure" for impacts to local governments.
February 26, 2004 Silver Bow County Commissioners	✓ <u>Expressed concern over how public meetings are announced (they should be better publicized in the newspaper).</u> ✓ <u>Expressed concern over weeds.</u>
March 1, 2004 Broadwater County Commissioners	✓ Asked questions regarding the proposed withdrawal of the Limestone Hills Training Area and how this relates to the RMP. ✓ Asked questions regarding a "no hunting" sign near River Road. ✓ Discussed the possibility of Broadwater County serving as a Cooperating Agency.
March 2, 2004 Deer Lodge County	✓ Asked questions regarding specific roads in the area - concern over travel planning.
March 3, 2004 Jefferson County	✓ Asked questions regarding the overall RMP/EIS process. ✓ Stated they would like to see the Proposed Action before it is sent to the public.
March 17, 2004 Big Hole Watershed Committee	✓ Wanted the Recreation Issue to be separate/clearer - it is currently under commercial uses and needs to be its own issue to address things like fishing access, camping, etc. and not just commercial uses and travel planning. ✓ In general, they would like the Issues explained better (e.g., the sub-categories in the large issues). ✓ Would we be doing travel planning in the Big Hole River area (collaboration meetings)? ✓ Are there any more chances for public involvement? ✓ Were we working with the Dillon Field Office and FS during our RMP (collaborating with the other agencies)?
October 30, 2003 Resource Advisory Committee (RAC) in Billings, MT	✓ When would we like the RAC to be involved? ✓ What do we mean by getting away from traditional range of alternatives (i.e., the preservation oriented and commercial oriented)? ✓ How would the collaboration meetings work? ✓ What is our schedule? ✓ They like the idea that we're focusing on collaboration early in the process. ✓ They like the idea of alternatives that are focused/responsive to the issues.
February 27, 2004 American Wildlands	✓ Wanted to discuss their Scoping Letter; written information from this letter has been incorporated into the following section of this report and into Appendix F.



Date/Location	Comments
April 27, 2004 East Pioneers Stewardship Group	<ul style="list-style-type: none">✓ Why does BLM show private conservation easements and corporate timber lands?✓ The BLM lands should show up more on the maps.✓ Is BLM going to do things the same as Dillon?



Written Scoping Comments

In addition to receiving verbal comments during the public scoping meetings, the Butte FO also received written comments through the mail, fax, and e-mail. Written comments summarized in this report were received during the scoping period (December 19, 2003 through February 17, 2004), as well as comments that were received shortly after the deadline, yet postmarked by February 17th, to compensate for mail delay.

Method of Submittal

Written scoping comments were accepted via mail, e-mail, and fax resulting in a total of 17 responses, containing 554 comments. A response is defined as one letter, e-mail, or written scoping meeting comment. One person could submit more than one response. Because some responses had more than one comment, the total number of comments received is greater than the number of respondents, or individuals who submitted comments. For example, one person could submit two emails with one e-mail containing a comment on wildlife and another on forestry. The second e-mail could contain one comment on wilderness. Thus, this example would be calculated as two responses and three comments, all from one person.

Table 3. Written Comment Source Data

Method of Submittal	Responses Received	Comments Received
Mail/Letter	8	514
E-Mail	5	33
Scoping Meetings (Public Comment Forms)	4	7
Total Comments	17	554

A majority of the comments are from the Capital Trail Vehicle Association (319 comments) and U.S. Environmental Protection Agency (126 comments). Comments from the Capital Trail Vehicle Association have off-highway vehicle (OHV) use as their primary issue. Comments from the U.S. Environmental Protection Agency have proposed management direction, resource management, wildlife and fisheries management, water quality and watershed management, fire and vegetation management, habitat management, OHV management, and Tribal coordination as their main issues.

Agency comments received from the U.S. Environmental Protection Agency, Region 8 are provided in Appendix E.



Number and Type of Comments Received

Each comment was provided an identification number that corresponds to the 17 response letters, emails, and public comment forms received. Each letter was numbered with an "SC," for "scoping comment," followed by the letter number (i.e. SC1 through SC 17). A table was created for comments and organized by response identification number, comment type, and respondent affiliation (see Appendix F). Repetitive comments within one response letter were not included. Each response was read in its entirety and all distinct comments were categorized for enumeration and analysis.

Table 4 indicates the relative interest of respondents who submitted written comments towards various broad topics. This enumeration is not intended to show bias towards any issue; it is simply to indicate the level of interest in various issue areas. All issues will be addressed equally in the EIS and RMP. It is important to again note that most comments are from the Capital Trail Vehicle Association and U.S. Environmental Protection Agency. As a result, the enumeration in Table 4 is skewed to reflect the interests of these two groups.

Table 4. Written Comment Category Enumeration

Comment Category	Number Received	Percentage
Air Quality	6	1 %
Cultural Resources	1	Less than 1 %
Lands and Realty	17	3 %
Minerals/Mining	11	2 %
Recreation Resources, including Public Access	70	13 %
Off-Highway Vehicle (OHV) Use	240	43 %
Transportation and Access	27	5 %
Socioeconomics	9	2 %
Soils	1	Less than 1 %
Surface Disturbance Restriction Decisions, including Erosion Control	6	1 %
Vegetation, including Weed Control	23	4 %
Fire Management	23	4 %
Forestry Management	3	Less than 1 %
Livestock Grazing	12	2 %
Water Quality and Watershed	47	8 %
Wildlife and Fisheries	24	4 %
Special Management Areas	19	3 %
General Comments	15	3 %
Total	554	100 %



Written Comment Summaries

As previously discussed, each of the comments were categorized into one (or more than one if necessary) particular resource category. Following is a summary of the comments received, organized by such categories.

Air Quality

Air quality issues were raised regarding public health and welfare impacts caused by wildland and prescribed fires. The U.S. Environmental Protection Agency recommended following the Interim Air Quality Policy on Wildland and Prescribed Fires (May 15, 1998) to assure that an air quality analysis was completed if prescribed burning was proposed on projects tied to a programmatic land management plan.

Cultural Resources

Comments directed toward cultural resources addressed the need for protecting historic trails and abandoned mine sites that provide points of interest and access routes for OHV use. Cultural, historical, and archaeological resource analysis was recommended as part of the environmental analysis for the EIS. Several comments suggested that the presence of cultural resources should not prevent public access on public lands.

Lands and Realty

Comments received in this category expressed concern over the cumulative loss of public land to private ownership and loss of public access to public lands through access closures. Comments also expressed concern with land exchanges and land pooling practices that have reduced access to public lands. Other comments addressed land management policies regarding small, isolated tracts of land that are being sold or exchanged because they are “hard to manage.” Additional comments reflected the concern that the BLM land adjustment program provides no long-term benefit to the public. One respondent wanted the commercial use of public lands to be encouraged and promoted over all other considerations.



Minerals/Mining

Most comments received in this category expressed the need to identify and decommission abandoned mines to protect the public (hikers, pets, and children) from hazardous conditions at the abandoned mines. Respondents also suggested that access to active mining operations be restricted for safety purposes and that the mine owners should pay for putting up fences or signs. Comments also suggested the support of mining and resource development on public land. One respondent expressed concern that vast sums of money have been approved for mine reclamation and safety but no changes to the mines have been made. Other respondents indicated that efforts should be made to retain mine sites as points of interest and to allow collecting of rocks.

Agency comments expressed concern over the impacts to public health and the environment from hard rock mining, specifically that the RMP and EIS should evaluate the potential for acid mine drainage and metal or nutrient transport, or pollution that could occur during mineral exploration and development on Federal lands. Comments also suggested that it would be useful if the EIS discussed the Hard Rock Mining Act of 1872, its benefits and impacts, and potential conflicts with the Clean Water Act, Clean Air Act, and Endangered Species Act. Other comments recommended that responsible parties conduct and pay for cleanup at mine sites.

Recreation Resources

Comments suggested that the RMP address the fact that user demand and recreational access has increased significantly and management practices have shifted over the last 15 years, where motorized vehicles can access much further into the forest than they could historically. The EPA encouraged locating campgrounds and concentrated recreational uses away from ecologically sensitive areas. Many respondents felt that the largest numbers of recreational users were those using motorized vehicles (cars, campers, OHV, motor bikes, etc.) and that access for motorized users was significantly decreasing because of the influences that non-motorized recreational users have on the decision-making processes for recreational access on public lands. Many comments suggested that public lands be available to all users, motorized and non-motorized, and that non-motorized recreational users should not be able to have more access to public lands than motorized users. Some comments suggested that well-funded and organized anti-motorized groups have systematically reduced economic and recreational opportunities for motorized users. Some respondents expressed concern that multiple-use management goals are not meeting the needs of the public equally for all users, including motorized and non-motorized users, and that multiple-use goals are inconsistent with directives from Congress and other federal land-use policies.

Several respondents felt that public lands should be open for multiple use, but also to have some areas and trails with limited types of use (hiking only or OHV use only) since some recreational uses did not mix well, or were not compatible.



One respondent requested that there should be more camping areas along motorized routes, due to the lack of available camping spots on holiday weekends. One respondent requested that outfitters be able to take camping/ river trips on the Big Hole River. Another respondent expressed concern that the East Bank Campground on the Big Hole River not be expanded since the river already had all the rafters it could handle. One respondent felt that restrictions on firearms possession be removed from all public lands.

Off-Highway Vehicle Use

One OHV group submitted nearly 250 comments; many of these comments focused on the availability of public lands to OHV users. Most of the comments in this category favored OHV use on most public lands, with less restrictions on motorized vehicle access. Many of the comments expressed concern that there has been a significant closure of motorized access due to federal land management actions and policies. Comments in this category expressed concern that there have been a disproportionately large amount of adverse impacts to motorized recreational users who want to use public lands and that the desires of non-motorized users are being favored over the desires of motorized users. Some respondents indicated that concerns of OHV recreationists were not being addressed or adequately represented during the EIS and RMP process. Comments in this category suggested that the federal agencies did not adequately acknowledge the public need for OHV recreation and did not take the responsibility to provide adequate management for OHV recreation. Comments received expressed that there has not been an evaluation of the cumulative impact of all of the access closures to motorized users over the past 35 years. Comments suggested that mitigation measures be evaluated and taken before an access route is closed to motorized users.

Several comments reflected that federal agencies were not able to assess if the needs of motorized users were being met because the data did not exist. Data should be gathered that reflects an inventory of all existing motorized routes in use by the public; each road and trail should be evaluated to determine its recreational value, motorized loop, or connected route value; and source of dispersed campsite, exploration opportunities, or historical or point-of-interest destinations. Respondents indicated that there was no hard evidence of the potential impacts of OHV use on wildlife and vegetation when compared to the impacts of non-motorized users. Some respondents suggested that adequate and accurate field data for visitor use in the project area be developed. Respondents feel that if representative recreational use data was available that more opportunities for motorized users would be justified and available. Respondents also expressed concern that data from the National Visitor Use Monitoring (NVUM) project would not be used to accurately portray the importance of motorized access and mechanized recreation on public lands. Additionally, some respondents felt the 1994 Montana Trail Users Study, 1998 Montana's Assessment of Montanan Fish,



Wildlife, and Parks Programs, and the Statewide Outdoor Recreation Plan (SCORP) did not accurately assess the numbers and needs of motorized recreationists.

Respondents in this area also believed that OHV use could coexist with other recreational uses and that more public access should be available for OHV users. Some respondents recommended that certain areas on public lands be designated for different types of recreational uses, to avoid conflicts between different types of recreational users that are not compatible. Several respondents indicated that the Visitor Maps are not consistent with the Travel Plan maps and that this difference causes misunderstandings between motorized and non-motorized users.

Some OHV users expressed the concern that the NEPA process was overwhelming and that it was difficult to be able to attend or comment on every BLM land action that may affect motorized access on public lands. Respondents indicated that the NEPA process was complicated and unapproachable and that there has not been more of an effort to inform, educate, and increase the public's awareness and ability to work with the NEPA process.

One respondent complained that OHV users drove all over the public land and that no BLM employees enforced the recreational use regulations. Another respondent recommended consideration of a policy that prohibits off-trail snowmobile use until at least 6 inches of snow has accumulated in areas with fragile alpine vegetation.

Transportation and Access

Most respondents in this category expressed that the RMP needed to maintain public access and right-of-ways throughout the project area. Many respondents indicated that they wanted all existing public access to remain open, and that land ownership transfers and other property issues should not prevent public access to public lands.

Most respondents expressed concern over the past and potential loss of access to public lands. Comments received focused on not losing any more public access during the ownership adjustment process or the consolidation of public lands and to stop and reverse the trend of closing access to public lands. Respondents expressed concern that the EIS and RMP evaluate the cumulative, long-term effects of removing access to public lands, based on what has occurred over that last 35 years and what it could mean for future recreational users that will want to access public lands.

Some respondents indicated that the RMP needs to provide for access to the elderly and physically impaired. Other respondents requested that additional forest roads be designated as dual-use so that OHV users and other recreationists can travel more easily between OHV routes that are not connected.



Another respondent encouraged the BLM to include the use of airplane access and airstrips because it provided recreational access to beautiful areas and allowed emergency landing places for pilots when flying over remote locations.

Socioeconomics

Several comments in this category indicated that social and economic concerns should focus on the beneficial economic and social use of public lands, not locking them up from development or public access. One respondent indicated that the RMP should not allow livestock allocations to be converted into wildlife allocations unless valid economic studies show that the conversion was equal to, or better for, the local area economic structure and tax base. Another respondent suggested that the EIS look at the importance of OHV and other motorized recreationists have on the economies of local communities, and the adverse impacts that would be created if areas were closed off to motorized use. Agency comments recommended that the EIS include an analysis of long-term economic value of leaving the forest landscape as it is and that there may be economic gains in non-disturbance methods versus the economy of forest product utilization.

Soils

One respondent indicated that the EIS and RMP needs to recognize that Natural Resources Conservation Service soil surveys are the documents for which all public land decisions and activities related to soil conservation would be based.

Surface Disturbance Restriction Decisions

The EPA indicated that the RMP needs to provide direction for minimizing road impacts to water quality, fisheries, and wildlife. The EPA recommended that the RMP allow for reductions in road density, improvements in road drainage, and reductions in sediment delivery from roads, which were important components for improving aquatic health in project area streams. The EPA also suggested that the RMP provide management direction that required inspections and evaluations to identify existing road conditions that cause non-point source pollution and stream impairment.

Vegetation

Several respondents indicated that measures be taken to prevent the spread of noxious weeds. One respondent indicated that there seemed to be an equal amount of noxious weeds in non-motorized areas as there were in motorized areas and that as part of their vehicle registration for OHVs, a certain amount of money went to weed abatement, but non-motorized users did not have to pay this fee. The EPA recommended that noxious weeds and exotic species should be identified and that the EIS should discuss the



magnitude and occurrence of weed infestations, strategies for prevention, early detection, and control procedures.

Fire Management

Most of the comments in this category were from the EPA and include policy development recommendations for the RMP including (1) recognizing the role of fire as a disturbance process, (2) implementing the National Fire Plan which directs a full range of fire management activities, (3) implementing the 1995 Federal Wildlands Fire Management Policy and Program Review which provides direction for fire management planning, working with landowners, and directing landscape level analysis, and (4) identifying areas appropriate for wildland fire use. Some respondents expressed concern regarding the potential air quality and respiratory hazards associated with prescribed and catastrophic fires. The EPA recommended that the RMP incorporate the 1998 Interim Air Quality Policy on Wildland and Prescribed Fires to address and minimize public health impacts caused by fires. The EPA also recommended that although fire suppression seemed to be a major theme of forest management for wildfires, the RMP should promote public education programs to increase the public's understanding of the benefits of prescribe burns for vegetation management and wildfire risk.

Forestry Management

Most of the comments regarding forestry management were from the EPA including that forestry and land management should be based on understanding of all natural disturbance processes such as fire, insects and disease, and ecosystem processes and dynamics. The EPA recommended that it was important that ecosystem integrity be maintained to allow sustainable levels of timber production along with other resource uses over the long term. Another comment from the EPA recommended that the EIS discuss the economic consequences of implementing the various management alternatives including estimates of job additions or losses attributed to timber management. One comment in this category also recommended that pine beetles be controlled in an expedient and cost effective manner.

Livestock Grazing

Several comments on livestock grazing expressed dislike over the current livestock grazing and vegetation management programs, saying the programs were poorly managed and detrimental to vegetation, wildlife forage, and soil condition. In these instances, the respondents recommended going from management by fencing off areas, to rest-rotation grazing programs like the programs designed by Gus Hormay, formerly of the BLM. Another respondent asked how did designating an area as an 'area of critical environmental concern' impact livestock grazing at an adjacent ranch owners' property. Other comments favored livestock grazing on public lands and improving



forage for livestock, as well as wildlife. Comments also favored reducing forage allotments during drought or other natural disasters, then increasing the forage allotments when areas were restored. The EPA recommended livestock grazing management should be aimed at maintaining a sustainable grazing program that protects range and riparian resources, water quality, and fisheries.

Water Quality and Watershed

Many comments in this category indicate that it is important to protect water quality and watersheds in the project area. The primary issues raised by the EPA included that the RMP should support maintenance of hydrological and aquatic species goals and restoration of watershed health; protection of riparian and wetland habitat and aquatic species; achievement of water quality levels that fully supports designated beneficial uses of surface waters; and protection of high quality waters consistent with EPA and State anti-degradation and non-degradation policies, including the Clean Water Act (see Appendix E for EPA's specific comments and recommendations for preserving water quality and watersheds in the project area). The American Wildlands group completed an Aquatic Integrity Area analysis and River Integrity Area analysis that identified high quality watersheds and rivers in and outside the project area. The American Wildlands group recommended using their data and maps as management tools to identify watersheds and rivers needing special protection or restoration in the project area.

One respondent requested that the BLM disclose the list of impaired watersheds within the project area. Another respondent expressed support for the protection of waters and aquatic species, but not at the expense of meaningful development of public lands.

Wildlife and Fisheries

Most comments in this category supported the need to protect wildlife and fish and their habitat. The EPA believed the RMP should provide for the protection and conservation of wildlife including conservation and recovery of threatened and endangered species and diversity of plant and animal communities. The EPA recommended BLM implement the Interior Columbian Basin Strategy which identifies the BLM's responsibility to provide habitat for productive and diverse populations of terrestrial wildlife species while coordinating with the U.S. Fish and Wildlife Service, and Montanan Department of Fish, Wildlife, and Parks. Another respondent recommended that the RMP identify impaired streams and to provide for the restoration of native fisheries and aquatic strongholds that support native fisheries. Some respondents recommend that the BLM should not allow motorized use in Wilderness Study Areas because some studies have shown that areas with poorly maintained roads, along with non-native fish species introductions, are responsible for the decline of native fish species and their habitat.



One respondent recommended the effective management of wildlife corridors in the project area by using the least-cost-path corridor model as a basis for managing and preserving connected habitat; managing corridor areas as critical habitat for threatened, endangered, and sensitive species; maintaining the integrity and un-motorized character of all roadless areas within the region; maintaining at least two alternative routes between each of the large core reserves; maintaining a corridor of high quality habitat about 5 kilometers in width, with a 5 kilometer buffer zone of medium quality or low quality habitat on either side of the core; and ensuring that no segment of the corridor core was less than one kilometer wide to either side of the centerline. This same respondent recommended that the RMP consider that wildlife corridors extend beyond the project area and include whole mountain ranges. Another comment suggested that wildlife connectivity should be considered as a dominant use of Areas of Critical Environmental Concern during the travel management decision process.

Several respondents supported the preservation of introduced, threatened, and endangered species, but not to the point where it resulted in detrimental effects to the area economy, lifestyle, access to public lands, and development of public lands. Some respondents expressed concern over the building of high pole fences as part of ranching activities, without apparent concern for the movement or migration of big game animals and wildlife.

Special Management Areas

Many respondents in this category support the designation, use, and management of special management areas. Specific special management areas cited include areas of critical environmental concern, wild and scenic river areas, recreational river areas, and wilderness study areas. Respondents recommend that the RMP inventory and identify all rivers, streams, and areas that are eligible for one of these designations and that the value of these areas be maintained and protected. The American Wildlands group had evaluated most of the rivers, streams, and areas within the project area, and provided specific recommendations in their comments for special management area designations.

One respondent suggested not to designate any more special management areas without a thorough evaluation of the economic resources that would be lost if recommended. Another respondent indicated that wilderness designation was not good for recreation and that an alternative designation was needed to allow motorized recreation on more public lands.



General Comments

Comments that were categorized as “General” did not have a single theme that was easily identifiable or in some cases covered many different topics. Some of the comments related to issues that were extremely focused on a specific issue or were so general that the comment did not apply to a specific issue. Because a summary of the comments in this category would be impractical, a sample of some topics is listed below.

- Consider solid waste management when evaluating BLM facility needs
- Identify and address any oil and gas development activities
- Identify pollution prevention strategies
- Focus on multiple use
- Incorporate recommendations of Big Hole River Land Use Plan in RMP
- Develop guidelines to determine if perceived impacts are significant or insignificant

Comments Requiring Clarification

Public comments that requested clarification or expressed a concern about the process are listed in this section with agency responses. All other verbal and written comments presented in this document will be considered in development of the RMP/EIS.

The comments listed in this section address either an issue of concern that is beyond the scope of the RMP or a planning process concern that can be addressed immediately. These comments were not included in the tallying of the total comments received during the scoping process. Because a summary of the comments in this category would be impractical, a sample of some issues, along with BLM’s responses, are listed below.

Comment	Response
<ul style="list-style-type: none"> ✓ Enforce public land management policies and laws ✓ Follow appropriate Federal and State guidance and policies for preparing EIS and RMP 	The RMP/EIS will follow all existing policies and laws.
<ul style="list-style-type: none"> ✓ Streamline the RMP planning process ✓ Use easily understandable tables, maps, charts, and photos as much as possible in EIS and RMP ✓ Educate the public more on NEPA process 	BLM will make every effort to provide concise, understandable planning and National Environmental Policy Act (NEPA) documents.



✓ Identify purpose and need for revision to existing RMP	These will be identified in the EIS.
✓ The EIS should identify the decisions made with the RMP	
✓ Coordinate with tribal governments	The Butte FO is currently coordinating this effort with tribal governments.
✓ Incorporate environmental justice issues	Environmental justice issues will be addressed in the EIS.
✓ Explain the rationale for the project area boundary	The project area boundary is comprised of the eight counties that encompass the Butte FO lands. This will be explained further in the EIS.
✓ 'Cooperating agency status' should not be considered for non-government agencies	Cooperating Agency status will not be considered for non-government agencies.
<p>✓ OHV recreationists in Montana generate total state and federal annual gas tax revenue on the order of \$8 million. A federal excise tax refund program for gasoline used for off-road purposes does not exist at this time. Excise tax on gasoline used for off-road fuel use should either be refunded to off-highway recreationists or used to fund programs that benefit off-highway recreationists.</p> <p>✓ OHV recreation and tourism has not been promoted or supported by Montana Department of Fish, Wildlife, and Parks as aggressively as other recreation and tourism associated with fish and wildlife programs. OHV users request that Montana Department of Fish, Wildlife, and Parks actively promote OHV recreation and tourism.</p>	The BLM has no authority over these programs.
✓ Recommend no lands be withdrawn from full multiple use	The RMP/EIS will examine all land use.
✓ BLM managers should develop and maintain communications with adjacent landowners	The BLM managers are always willing to meet, and work with, adjacent landowners.
✓ Do not agree with paying Texas Tech (out of state) firm to prepare EIS and RMP	The firm assisting BLM with the Butte FO RMP/EIS is Tetra Tech Inc., with offices in Helena, Bozeman, Great Falls, and Missoula, Montana (not a Texas firm).



✓ Do not pursue environmental perfectionism when balancing the needs of humans versus the environment	The RMP/EIS will examine both environmental and socioeconomic alternatives, and impacts.
✓ Do not make the comment process a voting process for how important an issue is based on the number of comments received in a certain category	The comment process is not a voting process; we will examine the substance of each comment, not the volume of comments.

